

UNITED STATES DISTRICT COURT

for the

Eastern District of Wisconsin

United States of America

v.

Jesus Lara

Case No. 21 MJ 213

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of October 20, 2021 in the county of Milwaukee in the
Eastern District of Wisconsin, the defendant(s) violated:

Code Section

18 USC 924c

Offense Description

Possession of a Firearm in Furtherance of Drug Trafficking

This criminal complaint is based on these facts:

See Attached Affidavit

☒ Continued on the attached sheet.

 1258 10/20/21 1450 hrs

Complainant's signature

FBI TFO Michael Seeger

Printed name and title

~~Sworn to before me and signed in my presence.~~

Sworn to by telephone pursuant to Fed. R. Crim. P. 4.1.

Date: October 20, 2021

City and state: Milwaukee, Wisconsin



Judge's signature

Honorable William E. Duffin, Magistrate Judge

Printed name and title

**AFFIDAVIT IN SUPPORT OF
AN APPLICATION FOR COMPLAINT AND ARREST WARRANT**

I, Michael Seeger, being first duly sworn, hereby depose and state as follows:

I. INTRODUCTION AND AGENT BACKGROUND

1. Affiant has been a law enforcement officer since May 2008. Affiant is a Detective with the Racine Police Department (RAPD) and currently deputized through the Federal Bureau of Investigation (FBI) which expires October 1, 2022. As such, I am an investigative or law enforcement officer of the United States within the meaning of Section 2510(7) of Title 18, United States Code, in that I am empowered by law to conduct investigations of and to make arrests for federal felony offenses.

2. Affiant is currently assigned to Special Investigation Unit (SIU) – Drug Enforcement and working with the Milwaukee Area Safe Streets Federal Bureau of Investigation (FBI) Gang Task Force (MASSTF). Prior to becoming a Police Detective, Affiant received a bachelor's degree from University of Wisconsin- Platteville in the field of Criminal Justice.

3. As a drug unit detective with RAPD and MASSTF, Affiant has participated in the investigation of narcotics-related offenses, resulting in the prosecution and conviction of numerous individuals and the seizure of illegal drugs, weapons, stolen property, thousands of dollars in United States currency and other evidence of criminal activity. As a narcotics investigator, Affiant has interviewed many individuals involved in drug trafficking and have obtained information from them regarding acquisition, sale, importation, manufacture, and distribution of controlled substances. Through training and experience, Affiant is familiar with the actions, habits, traits, methods, and terminology utilized by the traffickers and abusers of controlled substances. Affiant has participated in all aspects of drug investigations, including

physical surveillance, execution of search warrants, controlled buy operations, court-ordered wiretaps, analysis of phone and financial records, and arrests of numerous drug traffickers. Affiant has also spoken on numerous occasions with other experienced narcotics investigators, both foreign and domestic, concerning the methods and practices of drug traffickers and money launderers. Furthermore, Affiant has attended training courses, which specialized in the investigation of narcotics trafficking and money laundering. Through these investigations, training and experience, and conversations with other law enforcement personnel, Affiant has become familiar with the methods used by drug traffickers to manufacture, smuggle, safeguard, and distribute narcotics, and to collect and launder trafficking-derived proceeds. Affiant is further aware of the methods employed by major narcotics organizations to thwart any investigation of their illegal activities.

4. Based on training, experience and participation in drug trafficking investigations and associated financial investigation involving controlled substances, Affiant knows and has observed the following:

- a. I have learned about the manner in which individuals and organizations distribute controlled substances in Wisconsin as well as in other areas of the United States.
- b. I am familiar with the coded language utilized over the telephone to discuss drug trafficking and know that the language is often limited, guarded and coded. I also know the various code names used to describe controlled substances.
- c. I know that it is common for persons involved in the sales of controlled substances to be armed with guns and/or to keep firearms in their residence/apartment for their protection and the protection of their controlled substances.
- d. It is a common practice for individuals engaged in high level drug trafficking activities to use multiple locations to conduct their drug trafficking activities. For example, a “stash house” is a location used to store controlled substances, firearms, and U.S. Currency.
- e. I know large-scale drug traffickers often purchase and/or title their assets in fictitious names, aliases or the names of relatives, associates or business entities to avoid detection of these assets by government agencies. I know that even though these assets are in the

names other than the drug traffickers, the drug traffickers actually own and continue to use these assets and exercise dominion and control over them.

- f. I know large-scale drug traffickers must maintain on-hand, large amounts of U.S. currency in order to maintain and finance their ongoing drug business.
- g. I know it is common for persons involved in large-scale drug trafficking and related financial crimes to maintain evidence pertaining to their obtaining, secreting, transfer, concealment and/or expenditure of drug proceeds, such as drug ledgers, currency, financial instruments, precious metals and gemstones, jewelry, books, records of real estate transactions, bank statements and records, passbooks, money drafts, letters of credit, money orders, passbooks, letters of credit, bank drafts, cashier's checks, bank checks, safe deposit box keys and money wrappers. Because narcotics trafficking generates large sums of cash, it requires the keeping of detailed records as to the distribution of narcotics as well as the laundering of the proceeds. Such records also typically provide evidence as to the identity of additional criminal associates who are facilitating the laundering of the narcotics proceeds on behalf of the organization. These records, unlike controlled substances, are often maintained for long periods, even several years. These items are maintained by the traffickers within residences, stash houses, vehicles, or other locations over which they maintain dominion and control.
- h. I know it is common for drug traffickers to maintain books, records, receipts, notes ledgers, airline tickets, receipts relating to the purchase of financial instruments and/or the transfer of funds and other papers relating to the transportation, ordering, sale and distribution of controlled substances. That the aforementioned book, records, receipts, notes, ledger, etc., are maintained where the traffickers have immediate access to them.
- i. It is common practice for individuals who are involved in business activities of any nature to maintain books and records of such business activities for lengthy periods of time. It is also common practice for individuals who maintain these records to keep them in places that are secure but easily accessible such as in their businesses, offices, or personal residence.
- j. It is also common that individuals who are attempting to conceal their true income from the IRS will maintain records that will establish their true ownership of assets or other expenditures in a secret manner. These records have included bank records, automobile titles, property deeds, cashier's check receipts, money order receipts, wire transfer receipts, documents pertaining to storage facilities or safe deposit boxes, documents or agreements detailing the true ownership of assets, photographs of the true owners with the concealed assets, or other items such as sales receipts, purchase orders, or shipping invoices.
- k. Likewise, it is common for businesses who engage in transactions with individuals involved in criminal activity to conceal the nature of the transactions through false records such as invoices, by maintaining false financial records, or placing the transaction in a nominee name. These businesses may need to keep these false records for inventory

or bookkeeping reasons. However, these false records may be placed in a separate location such as a personal residence, safe, or safe deposit box for concealment.

- l. I know large-scale drug traffickers often use electronic equipment such as telephones (landlines and cell phones), pagers, computers, telex machines, facsimile machines, currency counting machines and telephone answering machines to generate, transfer, count, record and/or store the information described in the items above, as well as conduct drug trafficking activities.
- m. I know when drug traffickers amass large proceeds from the sale of drugs, the drug traffickers attempt to legitimize these profits through money laundering and structuring activities. To accomplish these goals, drug traffickers utilize the following methods, including, but not limited to: domestic and international banks and their attendant services, securities brokers, professionals such as attorneys and accountants, casinos, real estate, shell corporations and business fronts and otherwise legitimate businesses which generate large quantities of currency.
- n. I know that the Currency Transaction Report (CTR) (Fincen Form 104), which is required to be completed and filed with the IRS by all financial institutions on every currency transaction that exceeds \$10,000, causes tremendous problems with drug traffickers when they attempt to negotiate their illegal profits at a financial institution; I further know that the courts have recognized that unexplained wealth is probative evidence of crimes motivated by greed, in particular, trafficking in controlled substances.
- o. I know drug traffickers commonly maintain addresses or telephones numbers in books or papers which reflect names, addresses and/or telephone numbers of their associates in the trafficking organization(s).
- p. I am familiar with computers, cellular telephones, pagers and their uses by drug traffickers to communicate with suppliers, customers, and fellow traffickers and by those engaged in money laundering and structuring activities to communicate with their associates and financial institutions; That drug traffickers use these devices to record their transactions and aspects of their lifestyle related to drug dealing, whether in the form of voicemail, email, text messages, video and audio clips, floppy disks, hard disk drives, flash drives, CD's, DVD's, optical disks, Zip disks, flash memory cards, Smart media and any data contained within such computers or cellular telephones, electronic storage media and other settings particular to such devices; I know that such devices automatically record aspects of such communications, such as lists of calls and communications, and any particularized identification assigned to those source numbers or email addresses by the owner of the devices.
- q. Specifically, I know the following information can be retrieved to show evidence of use of the computer to further the drug trade and/or related financial crimes; Computer systems and cellular telephones, including but not limited to system components, input devices, output devices, data storage devices, data transmission devices, and network devices and any data contained within such systems; and computer media and any data

contained within such media and other material relating to computer systems and the internet including but not limited to, documentation, operating system software, application or access program disks, manuals, books, brochures, or notes; and computer access codes, user names, log files, configuration files, and passwords, screen names, email addresses, IP addresses and cellular / wireless telephones, SIM cards, any removable storage devices for telephones, and any data contained therein, including but not limited to stored telephone numbers, recently called numbers list, text messages, digital audio and/or video recordings, pictures, settings, and any other user defined settings and/or data.

II. INVESTIGATION OF JESUS LARA

5. Since approximately November 2020, the MASSTF and Racine Police Department have been investigating members of the Gangster Disciples (GD) and Vice Lords (VL) street gangs who work together to further their drug trafficking organization on the South side of Racine, Wisconsin. As part of the investigation, members of the Federal Bureau of Investigations (FBI), Drug Enforcement Administration (DEA), Racine Police Department (RAPD), Racine County Sheriff's Department (RCSD), and Village of Mount Pleasant Police Department (MPPD) have conducted physical surveillance, conducted controlled buys of controlled substances, and obtained information through Sources of Information (SOI).¹ MASSTF learned that MARQUAN WASHINGTON, MARIO JOHNSON, MICHAEL HARDIN, TERRY BRUMBY, PLAZE ANDERSON, CARL GRAYSON, and ASHLEY WESTMORELAND were working together to distribute crack and powdered cocaine on the Southside of Racine. MASSTF learned and verified that MARQUAN WASHINGTON is

¹ During the below listed controlled buys of controlled substances the CHS placed a recorded phone call to the target, captured audio and video of the controlled purchase, was followed to and from the controlled purchase location, was searched before and after the controlled purchase with no drugs, money, or weapons located, debriefed after the controlled purchase, and the above evidence and statements reviewed and verified by law enforcement. Additionally, the controlled substances were all weighed and tested positive for the listed substance using Nark II test kits following the printed instructions and the target was identified by the CHS through photographs. For the purposes of this affidavit, CHS refers to those persons actively cooperating by conducted controlled purchases of illegal drugs. SOI refers to those persons providing information to law enforcement. A SOI with the same number as a CHS are the same person and has provided information to law enforcement and actively cooperated by conducted controlled buys of illegal controlled substances at the direction and control of law enforcement.

working with BRIAN PHILLIPS, known VL, who sells cocaine and heroin with JASMINE GONZALES and DEBRA URNESS on the Northside of Racine. MARQUAN WASHINGTON and BRIAN PHILLIPS obtain multiple kilograms of cocaine from GERARDO LARA, JESUS LARA and SARAH BECKIUS. Since June 2020, MARQUAN WASHINGTON, BRIAN PHILLIPS, GERARDO LARA, and SARAH BECKIUS have pooled money together and travelled out of state to obtain upwards of 9 kilograms of cocaine. MICHAEL WRIGHT has also participated in distributing cocaine with GERARDO LARA and JESUS LARA. MICHAEL WRIGHT obtained cocaine from GERARDO LARA and JESUS LARA prior to MICHAEL WRIGHT'S incarceration in February 2017 and since MICHAEL WRIGHT'S release on June 22, 2021. Further, investigators learned and verified BRIAN PHILLIPS and JERI BALDERAS, BRIAN PHILLIPS' girlfriend, invest their drug proceeds in purchasing multiple properties in the Racine area and rehabbing the properties.

6. Law enforcement conducted numerous debriefs, which included members of the drug trafficking organization, SOI #8, #9, and #18, and individuals that also participated in controlled drug buys including SOI #6, #7, #10, and #17. The debriefs consistently reflected that twin brothers, JESUS LARA and GERARDO LARA, and Gerardo's girlfriend, SARAH BECKIUS, are the major source suppliers of cocaine for BRIAN PHILLIPS and MARQUAN WASHINGTON. The debriefs further demonstrated that GERARDO LARA, BRIAN PHILLIPS and MARQUAN WASHINGTON pool their money together and travel out of state to purchase kilograms of cocaine. Several debriefs indicated BRIAN PHILLIPS and MARQUAN WASHINGTON would each obtain about 4 kilograms of cocaine per month from GERARDO LARA and JESUS LARA. The debriefs also revealed that in March 2021, SARAH BECKIUS and GERARDO LARA were robbed, and suspected MARQUAN WASHINGTON in the robbery,

so they no longer worked directly with MARQUAN WASHINGTON in obtaining cocaine. However, BRIAN PHILLIPS would still provide MARQUAN WASHINGTON with cocaine which BRIAN PHILLIPS obtained with GERADO LARA. Based on records from the Racine Police Department, a burglary in progress was reported at the prior residence of SARAH BECKIUS on March 9, 2021. Additionally, according to prison phone calls from MICHAEL WRIGHT to 262-598-7249, LARA was the victim of a burglary perpetrated by MARQUAN WASHINGTON for \$160,000.

7. SOI #15 stated that Sarah Beckius is dating Gerardo Lara and that Gerardo Lara has used Sarah Beckius to traffic kilograms of cocaine from the Chicago Area to Racine, WI. SOI #15 also stated from 2019 to July 2020, SOI #15 purchased powder cocaine in \$20 and \$40 quantities from Gerardo Lara 2-3 times a month. During this time frame, SOI #15 would also obtain powder cocaine from Gerardo Lara 2-3 times a month for Sarah Beckius. SOI #15 stated that one 5-6 occasions from 2019 to July 2020 SOI #15 would contact Gerardo Lara for powder cocaine and was directed to contact his brother, Jesus Lara for whatever amounts SOI #15 wanted. SOI #15 stated the drug transactions would usually happen at a gas station located on 7 Mile Road or at the Taco Bell on Douglas Avenue. SOI#15 stated on approximately 20 occasions from 2019 to July 2020, SOI #15 observed Brian Phillips inside the vehicle with Gerardo Lara during drug transactions. Sarah Beckius showed SOI #15 a picture of 8 kilograms of cocaine and Sarah Beckius stated the cocaine was picked up in Chicago. SOI#15 stated she/he observed another picture with Geradro Lara smiling next to 8 kilograms of cocaine. SOI #15 was also shown a horse farm on 7-Mile Road in Racine County where Gerardo Lara lives with his twin brother Jesus Lara. SOI #15 states that Jesus Lara is an enforcer and directly involved in the drug trafficking organization.

8. On July 19, 2021, TFO Langendorf and Affiant conducted a debrief of SOI #18. SOI #18 provided information on a group of individuals, including MARQUAN WASHINGTON, BRIAN PHILLIPS, CARL GRAYSON, GERARDO LARA, and JESUS LARA, who are working together to distribute controlled substances in the City of Racine. SOI #18 stated that for the last five years, BRIAN PHILLIPS has obtained 2 kilos (kilograms) of cocaine twice a month from a local Mexican guy by the name of “Dinero.” “Dinero” and his twin brother have a cartel connection in Illinois that BRIAN PHILLIPS and “Munch” (MARQUAN WASHINGTON) gets their kilos from. Recently, “Dinero’s” girlfriend, “Sarah” was recently arrested for having fentanyl. Affiant knows based on the investigation that SARAH BECKIUS was recently arrested with controlled substances and is dating GERARDO LARA.

9. SOI #22 identified Gerardo Lara a large kilogram level cocaine dealer in the Racine, WI and Milwaukee, WI area. SOI #22 was personally around Gerardo Lara from 2017 – 2019. Since 2017, SOI #22 knew Gerardo Lara to sell large amounts (kilograms) of cocaine. On two occasions during that time SOI #22 went over to Gerardo Lara’s farm identified as 8761 W 7 Mile Rd, Franksville WI. During one of the visits to Gerardo Lara’s farm, SOI #22 observed Gerardo Lara retrieve a bag of cocaine (described as a handful) out of alfalfa horse feed in a back horse barn. Gerardo Lara showed SOI #22 the cocaine and SOI #22 also observed additional individually packaged bags of cocaine in a McDonald’s bag that Gerardo Lara retrieved. SOI #22 heard that Gerardo Lara met the “Godfather” who would provide him the kilos (kilograms) of cocaine. SOI #22 knows that due to Gerardo Lara being a large level kilo (kilogram) drug dealer, he has lots of people selling cocaine for him. SOI #22 advised that Gerardo Lara always talked about selling kilos (kilograms) of cocaine and possessing and selling guns. SOI #22 knew Gerardo Lara and his brother, identified as Jesus Lara, to always have a gun on them. Gerardo

Lara has told SOI #22 that Jesus Lara is “a killer” and that he (Jesus Lara) gets amped up about everything. Gerardo Lara has also talked about killing people and said that his brother (Jesus Lara) is a bad person. On 10-12 occasions SOI #22 has observed Gerardo Lara in possession and spending large amounts of money, such as over \$5,000 cash, at the casino.

III. APRIL 2021 TRAFFIC STOP AND OCTOBER 2021 TRIP TO ILLINOIS

10. On April 19, 2021, Affiant became aware that Racine County Sheriff Deputy Austin Isferding conducted a traffic stop on JESUS LARA. During the traffic stop JESUS LARA was found to be in possession of suspected marijuana and a handgun. JESUS LARA was arrested for possession of THC, possession of drug paraphernalia, and carrying a concealed weapon. JESUS LARA provided his address as 8761 W 7 Mile Road, Franksville, Wisconsin. JESUS LARA was charged regarding this offense in *State of Wisconsin v. Jesus Lara*, Racine County Case No. 2021CM546. He was released on bond pending trial in that case.

11. On October 4, 2021, TFO HALEEN observed GERARDO LARA, JESUS LARA, and MICHAEL WRIGHT in the Gurnee Mills parking lot conversing together around the pickup operated by GERARDO LARA. MICHAEL WRIGHT received a package from GERARDO LARA and WRIGHT left the area in a white Dodge Durango while the pickup occupied by GERARDO and JESUS followed behind WRIGHT’s white Durango from Illinois to Racine, WI.

12. Once back in Racine, all three of them met again in the parking lot of Castle Ct. Apartments, where WRIGHT was observed by TFO KELAND handing the package back to GERARDO LARA, who then placed it in his GMC. WRIGHT left the area and GERARDO continued into the apartment complex. During this time frame, GERARDO LARA made phone contact with DONALD NEAL, who resides at 5608 Castle Court Apartment, #106. According

to records from the Wisconsin Department of Corrections, NEAL is a known Vice Lord street gang member and convicted drug dealer in Racine, WI. JESUS and GERARDO then drove from the Castle Court Apartments complex back to the farm. Based on their training and experience, and the investigation to date, I believe that JESUS LARA, GERARDO LARA, and MICHAEL WRIGHT traveled to Illinois to obtain and quantity of controlled substances that they transported back to Wisconsin.

IV. EXECUTION OF SEARCH WARRANT AT 8761 WEST 7 MILE ROAD

13. On October 20, 2021, law enforcement officers executed a search warrant at 8761 W 7 Mile Rd, Franksville, Wisconsin. Present at the time was JESUS LARA and his elderly father. In one bedroom that JESUS LARA identified as his, law enforcement officers located an assault style rifle. Observed in the bathroom attached to the bedroom was an empty plastic bag with white powdery residue. On the floor around the toilet, law enforcement officers observed white powder believed to be cocaine. Based on my training and experience, and the investigation to date, I believe that that JESUS LARA tried to flush cocaine down the toilet upon hearing police announce their presence.

14. After being advised of and waiving his rights, JESUS LARA admitted that the gun belonged to him. When officers found an additional quantity of cocaine on an outside barbecue grill, JESUS LARA admitted that it belonged to him. Law enforcement officers opened the grill and recovered approximately one ounce of a white powdery substance wrapped inside aluminum foil. The appearance is similar to that of cocaine and field tested positive for the presence of cocaine. Based on my training and experience, and the investigation to date, I believe that JESUS LARA possessed the firearm in furtherance of his drug trafficking activities.

V. CONCLUSION

15. Based on all the foregoing, I believe that there is probable cause to believe that JESUS LARA possessed a firearm in furtherance of his drug trafficking activities, in violation of 18 U.S.C. § 924(c).